



400 Central Park West 3R, New York, New York 10025 tel 240-475-0620

Electronic Filing

March 5, 2019

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Annual CPNI Certification of IIJ America, Inc.
EB Docket No. 06-36

Dear Sir or Madam:

Enclosed herewith please find the annual CPNI certification of IIJ America, Inc. for calendar year 2018. The undersigned counsel respectfully requests that this filing be received nunc pro tunc March 1, 2019. Due to administrative complications the company, whose parent company is overseas, was not able to submit the enclosed filing on the due date.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Fishman", with a long horizontal flourish extending to the right.

Eric Fishman
Counsel to IIJ America, Inc.

Enclosure

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: March 1, 2019
2. Name of company(s) covered by this certification: IIJ America, Inc.
3. Form 499 Filer ID: N/A (Company does not provide interstate telecommunications or interstate telecommunications service)
4. Name of signatory: Yasumitsu Iizuka
5. Title of signatory: Executive Officer, Global Business
6. Certification:

I, Yasumitsu Iizuka, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

Customer Proprietary Network Information

Purpose

The purpose of these procedures is to protect the confidentiality of proprietary information of carriers, vendors and customers.

Scope

These procedures apply to all personnel of IJJ America, Inc., including all permanent and temporary employees, their subsidiaries, affiliates, and members of their Board of Directors, as well as their consultants, advisors, and contractors.

Definitions

Customer Proprietary Network Information ("CPNI") means.

(a) Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer or a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and

(b) Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier.

IJJ America Service includes one category of service:

- (a) Broadband transport over fiber optic cable, and/or
- (b) Internet access over fiber optic cable.

Procedures

(a) CPNI may be released to contractors and/or vendors to provision IJJ AMERICA Service ordered by the customer or to install inside wire, maintain or repair IJJ AMERICA Service.

(b) CPNI will not be used for the purpose of marketing services, other than by affiliates of IJJ AMERICA when marketing IJJ AMERICA Service to a IJJ AMERICA customer. IJJ AMERICA will not use CPNI in any sales or marketing campaign. The President of IJJ AMERICA shall review all outbound marketing campaigns prior to implementation to insure compliance with these procedures.

(c) The IIJ AMERICA web site will not be used to collect personally identifying information. In particular, the web site will not be used to:

- Track, collect or record any information that can be used to identify an individual visitor at the IIJ AMERICA web site.
- Attempt to create marketing or email address lists from the email we receive.
- Participate in any data mining activities with other vendors.

IIJ AMERICA will not release any personally identifiable information to third parties for any reason. Additional information is included in the company's Acceptable Usage Policy that is included in our Customer Service Agreement.

Destruction of CPNI

Company records including CPNI shall be destroyed when no longer required. Paper records must be shredded. Electronic media shall be given to the Director, Network Operations for destruction.

Compliance

The issue of Confidentiality of information shall be discussed by supervisors with their direct reports and reinforced during periodic company-wide staff meetings. Employees must include "CONFIDENTIAL" on all documents that include CPNI.

It is the responsibility of all employees to comply with these procedures. Any deviation from this policy and its procedures may result in disciplinary action, up to and including termination of employment.

Advice and Counsel

The President of IIJ AMERICA shall provide advice and counsel regarding these procedures.

Reference

These procedures are required under Section 222 of the Communications Act of 1934 and Sections 64.2005 to 64.2009 of the Federal Communications Commission's rules.